**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

STEVE CUNNINGHAM	:	
	:	CIVIL ACTION
Plaintiff,	:	
	:	No.: 21-15717
v.	:	
	:	
COMMUNITY OPTIONS, INC.	:	
	:	
Defendant.	:	
	:	

**STIPULATION TO STAY PROCEEDINGS
TO ALLOW FOR ARBITRATION OF CLAIMS**

Plaintiff, Steve Cunningham ("Plaintiff") and Defendants Community Options, Inc. ("Defendant"), by and through their undersigned counsel, hereby state and STIPULATE as follows:

WHEREAS, Plaintiff initiated the above-captioned matter on August 19, 2021 alleging discriminatory and retaliatory termination from employment;

WHEREAS, Defendant has informed Plaintiff's counsel of an employment-related arbitration agreement; and

WHEREAS, by Agreement of the Parties and wishing to avoid unnecessary motion practice and for judicial efficiency, the Parties agree as follows:

1.   This matter shall be commenced as an arbitration matter before AAA, raising the same allegations as the Complaint in this action;

2.   Pursuant to 9 U.S.C. § 3, the above-captioned matter shall be *stayed* pending arbitration proceedings. *See Lloyd v. HOVENSA, LLC.*, 369 F.3d 263, 269 (3d Cir. 2004);

3.   The statute of limitations as to any and all claims asserted in the above-captioned matter shall be treated in arbitration as of the date initiated in federal court; and

4.   The Parties have consented to the use of electronic signatures on this Stipulation.

Respectfully Submitted:

By: */s/ David N. Korsen*
    David N. Korsen, Esq.
    Karpf, Karpf & Cerutti, PC
    3331 Street Road
    Two Greenwood Sq., Suite 128
    Bensalem, PA 19020
    Tel: (215) 639-0801
    dkorsen@karpf-law.com

Attorneys for Plaintiff

Dated: September 24, 2021

By: */s/ Joseph C. Toris*
    Joseph C. Toris, Esq.
    Jackson Lewis P.C.
    200 Connell Drive, Suite 2000
    Berkeley Heights, NJ 07922
    Tel: (908) 795-5200
    Joseph.Toris@jacksonlewis.com
    Attorneys for Defendant

Dated: September 24, 2021

Case stayed and administratively terminated pending arbitration.

So Ordered this 27th day of September, 2021.

Honorable Michael A. Shipp, U.S.D.J.